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March 21, 2018

BY ECF

The Honorable Edgardo Ramos
United States District Judge
40 Foley Square
New York, New York 10007

Re: *Martin Bleiwas v. City of New York, et al.*, 15 CV 10046 (ER)

Dear Judge Ramos:

I represent the plaintiff in the above-referenced civil rights action. I write in accordance with Your Honor's individual rules and Local Civil Rule 37.2, to request an informal conference regarding several discovery disputes which have arisen regarding certain documents requested by plaintiff and plaintiff's request that defendants produce a 30(b)(6) witness.

The parties have met and conferred regarding the disputes which are the subject of this request. Despite such efforts, the parties have been unable to reach a resolution and defendants' firm objections to producing the requested discovery or information was made known to plaintiff's counsel last night.

As Your Honor is aware, discovery in this matter is set to close March 23, 2018. Aside from the disputes which plaintiff seeks to raise with the Court, and which may necessitate a limited extension of discovery if plaintiff's requests are granted, the parties will have completed all other discovery by the current deadline.

Thank you for your consideration.

Respectfully,

s/ Brett Klein

Brett H. Klein

cc: Elissa Fudim (by ECF)